

The proposed fee schedule should be modified to include categories for Initial Application for Amateur Vanity Call Signs, Initial Application for Sequentially Assigned Amateur Call Signs, and Renewal of Amateur Call Signs. The previously presented reasons for maintaining the separate and higher fees for vanity call sign renewal are illogical, and arbitrarily ignore previous non-sequential assignments.

In a Report and Order approved 3 July 2002 and filed 5 July 2002, the Commission rejected a request to remove the additional fees for "vanity" call sign renewals.

The Commission's logic for maintaining the higher fees for vanity call signs is based on faulty logic. The R&O gives some examples of the activities which the Commission claims justify the renewal fees because they are on-going costs associated with running the program. In fact, all of the examples fall into two categories: activities associated with all call signs, or activities associated with initial vanity call sign applications. These activities are "protecting the assignment of vanity call signs", "investigating complaints on the improper or illegal usage of call signs", "requests for call signs that are already assigned to someone else", and "all related research that is necessary to insure the proper assignment of call signs".

These are either part of normal FCC regulatory duties, or should be covered by the initial vanity call sign application fees, since they apply to only vanity call sign requests. "Protecting the assignment of vanity call signs" is not a function of vanity call signs. Even sequentially assigned call signs, once assigned, would need to be protected. For example, if my father were still alive and still held the call sign I now hold, the amount of work required to protect that call sign would be the same. This cost should be equally shared among all license holders.

"Investigating complaints on the improper or illegal usage of call signs" is a concern for all license holders, and should be a cost shared by all license holders.

"Requests for call signs that are already assigned to someone else" is an administrative cost associated with the application for a vanity call sign. It is a one-time cost. If the initial application fees are insufficient to cover these costs, then those fees should be adjusted accordingly.

"All related research that is necessary to insure the proper assignment of call signs" is an administrative cost of assigning calls signs to new licensees. This should apply to sequentially assigned call signs (somebody has to consult the database for the next available call sign), as well as vanity call signs. If these fees are not commensurate with the burden, then adjust those fees.

For many years, Extra Class license holders could request specific 1x2 calls. Presumably many of the call signs issued under these old rules are still in use. I know of at least two still in use. The only functional difference between these call signs and vanity call signs is an annotation in the database, and an extra fee at renewal for those so marked. The costs to "protect" those other specially assigned call signs are the same as vanity call signs, yet there are no additional charges to those call sign holders.

Finally, what of the costs associated with a call sign reassignment in the case of a vanity call sign which is abandoned? Certainly there are extra costs associated with the issue of a renewal which includes a call sign change. Under the current structure, the Commission collects less money for such a renewal which requires more staff effort, and more money for a vanity renewal which requires the same effort as any other renewal.

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j.tandy@worldnet.att.net

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